UNITED STATES of AMERICA
U.S. DISTRICT COURT -- EASTERN DISTRICT OF MICHIGAN

KAREN LUSIER,

Plaintiff,

DEMAND FOR JURY TRIAL

-vs-

Case No.
Hon.

ALLY FINANCIAL INC.,
CAPITAL ONE BANK, N.A.,
TD AUTO FINANCE LLC,
FORD MOTOR CREDIT COMPANY LLC,
PNC BANK,
ROYAL OAK FORD SALES, INC., and
THE HUNTINGTON NATIONAL BANK,

Defendants.

COMPLAINT & JURY DEMAND

Introduction

1. Personal financial information may reveal the most private details of a consumer's lifestyle or mode of living, and any improper use constitutes an invasion of privacy of the consumer. As the banking and credit industries have developed systems and computer databases for legitimate, authorized and convenient access to this private, financial information, it has become, as a consequence, more convenient for people and companies with no legitimate reason to illegally invade a person's privacy by impermissible access to consumer credit histories.